Comments on RM-10740

The purpose of this note is to comment on the "Petition For Rule Making" filed by Mr.Michael D. Lonneke (W0YR) and Mr. Melvin Ladisky (W6FDR).

First **I do not agree that part 97 of the Commissions rules should be changed**. I will state my case for this position later however **the petition as written should be rejected and resubmitted because it does not state a clear criteria for measuring the bandwidth numbers the petitioners would like the FCC change part 97 to.** If I were for restricting SSB or AM bandwidth I would not agree with the petition as written.

Over the past 5 to 10 years amateurs have become aware that for a given bandwidth it was technically possible to significantly improve transmit audio quality without significantly increasing the overall bandwidth of the transmitted signal. Some of the early experimentation was done in the US (initially on 14.178 and other frequencies) and in Japan . One of the forums organized at the 2002 Dayton Hamvention was on SSB audio experimentation done in Japan. (All of the papers presented were presented by Japanese amateurs.) The aforementioned interest in improved SSB audio was recognized by amateur radio manufacturers .H. F. transceiver designers paid more attention to the SSB transmit audio capability and audio design. Radio's like the TS950SDX, TS870, FT1000MP, ICOM756PRO, Kachina, …Jupiter… were marketed with greatly improved SSB audio characteristics. Tens of thousands of the above model radio's are in use in the US and many many more are in use world wide. Having myself talked to thousands of amateurs I have found that many currently active amateurs have a renewed interest in amateur radio because the capabilities of radio's, like mentioned above, have given them a new refreshed interest in the hobby. They have become system intergrators experimenting with the audio capability and other characteristics of their radio's understanding how mic or external audio equipment or radio controllable audio adjustments effect transmit audio characteristics. Common operating practice of tens of thousands of amateurs is transmitting SSB at -40 dB bandwidths between 2.9 kHz and about 3.3 Khz . I would argue that good amateur practice has changed significantly since SSB was first introduced. Audio characteristics have changed from having non recognizable somewhat restricted audio characteristics to having audio where the amateur has natural / recognizable transmit audio. This shift in amateur practices worldwide start with experimenting. A next generation of experimentation has started.. A few amateurs have taken type accepted amateur gear have transmitted at –40 dB bandwidths in excess 4.5 kHz. **Even though I myself do not believe that one needs to have -40 dB bandwidths greater than about 3.3 kHz I am interested in what these experimenting amateurs find out in their experimentation**.

I believe that the current communications done by the amateur community and the FCC to remind experimenters of the potential secondary negative effects of their operations should be all that is required and a change in the part 97 rules in not warranted (as long as these experimenters operate responsibly) I have listened to many of the people sent advisory notices When I have heard them they have operated with courtesy and responsibly. The proposed "petition for Rules Making changes are not well thought out and defined and will actually hurt the hobby by discouraging experimentation and operating. **Don't' change part 97.**

Change is often hard for others to accept. I believe the job of the amateur community is to support an environment to encourage change. <u>I believe the FCC changing part 97 will be a setback to future change and the hobby.</u>

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